

RECEIVED

FEB 29 2012 *aw*

THOMAS G BRUTON
CLERK, U.S. DISTRICT COURT

Feb 29 2012

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KIR MOORMAN

#2011-0828086

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

12 C 1457

Judge Edmond E. Chang

Magistrate Judge Sheila M. Finnegan

COOK County Dept.
of Corrections

Thomas DART &

City of Chicago, Clo Lekatos

Clo Auen, Clo Brogsdale, SGT. Campos

Clo Rosales, Clo Ferguson, SGT. Ross

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

- A. Name: KIR Z. MOORMAN
- B. List all aliases: _____
- C. Prisoner identification number: #2011-0828086
- D. Place of present confinement: COOK COUNTY J.O.C.
- E. Address: P.O. Box 089002 Chicago, IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: R/O ROSALES, R/O ALLEN, R/O LEKAKOS
 Title: R/O (CORRECTIONAL OFFICER)
 Place of Employment: COOK COUNTY J.O.C.
- B. Defendant: R/O FERGUSON, R/O BROGSDALE
 Title: R/O (CORRECTIONAL OFFICER)
 Place of Employment: COOK COUNTY J.O.C.
- C. Defendant: SGT. ROSS + SGT. CAMPOS
 Title: Sergeants
 Place of Employment: COOK COUNTY J.O.C.

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: NONE / Available
- B. Approximate date of filing lawsuit: NONE / Available
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: NONE / Available
- D. List all defendants: NONE / Available
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NONE / Available
- F. Name of judge to whom case was assigned: NONE / Available
- G. Basic claim made: NONE / Available
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): NONE / Available
- I. Approximate date of disposition: NONE / Available

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Between January 5TH & January 12, 2012 at 10:15 p.m.
 In Division - 9 Tier 3-G (protective custody) Cell-Lower 3.
 C/O Allen, C/O Broggsdale, C/O Rosales, C/O Ferguson, C/O
 Lekakos, SGT. Ross, SGT. Campos: Run on Tier 3-G
 (protective custody) Straight to my cell Lower 3 & Told
 Me & My Celly Torres to go into the dayroom at which
 time we were cuffed to the steel part of the day-
 room chairs. The above C/O's & SGT's begin to
 Remove Commissary out of my cell in total they
 took \$80.00 in Commissary products (mostly food).
 When I asked "Why are all my Commissary items
 being taken SGT. Ross told me to "Shut the fuck up"
 & Slapped me with Black Gloves on his hands."
 I then asked "Why the fuck did you just slap me &
 I'm cuffed to a chair", SGT. Ross told me "Shut
 the fuck up! Before I Masturbate you." I told the C/O's
 "I'm calling my lawyer, you are taking Commissary
 from me because you can." That is when SGT. Campos

Maced Me in My face, uncuffed Me from the day room Chair & Brutally Cuffed My hands behind My back & escorted Me in the hallway. That is when they took Me into a Side Room in the interlock, put on their Gloves & begin to punch Me in the face. While My hands were Cuffed behind My back. C/O Allen, C/O Kekas & C/O Ferguson took turns punching Me Repeatedly while C/O Briggsdale & C/O Rosales held Me up by My Arms. They busted My lip wide open & I fell on the floor, that is when C/O Rosales Kicked Me in My face about 4 times & When I tried to Look up C/O Ferguson Kicked Me about 4 times in the Top of My head. Altogether I was Kicked about 8 times above My Neck. SGT. Ross & SGT. Campos stood and watched to Make Sure no one was coming & SGT. Ross Stated "Let him up. This is My Gang we Run this Shift. Stop filing Grievances or this is going to Continue to happen." I then spoke thru busted & bleeding lips & said "I'm pressing Charges." C/O Allen then Kicked Me in My back & I fell that is when I was Kicked in My back & Ribs again, I was Laying on My Side & while My hands were Cuffed

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I would like to be compensated financially & am civilly suing for \$800,000.00 (cruel & unusual punishment, pain & suffering, Mental anguish & denial of Medical attention.)

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this FEB day of 18, 2012

Kir Moorman

(Signature of plaintiff or plaintiffs)

Kir Moorman

(Print name)

2011-0828086

(I.D. Number)

Kir Moorman

5445 S. Cornell

Chicago, IL 60615

(Address)